

APPENDIX B

**REDACTED VERSION OF
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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S RULE
26(a)(3) WITNESS LIST**

Plaintiff Waymo LLC (“Waymo”) hereby provides its witness list pursuant to Fed. R. Civ. P., 26(a)(3) and paragraphs 1 and 2(a) of the Guidelines for Trial and Final Pre-Trial Conference in Civil Jury Cases Before the Honorable William Alsup.

Waymo identifies the name and, if not previously provided, the address, telephone number, and anticipated testimony of each witness it may present at trial other than solely for impeachment — separately identifying those the party expects to present and those it may call if the need arises. Waymo further reserves the right to call any witness on any of Defendant's witness lists, further including any of the witnesses identified by Defendants or Waymo on any subjects identified by either Defendants or Waymo.

Waymo reserves the right to supplement this list based on discovery not yet taken in the case, including relating to the production of the Stroz report and other materials produced as a result of the Federal Circuit's dismissal of the appeals relating thereto.¹

I. WITNESSES WAYMO WILL PRESENT AT TRIAL

Name	Contact Information	Substance of Testimony
John Bares	May be reached through counsel for Uber	Mr. Bares will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo’s trade secrets, including their acquisition, use and disclosure, and the lack of independent development; acquisition of Otto; and Mr. Levandowski's employment milestones.
Gary Brown	May be reached through counsel for Waymo	Mr. Brown will provide non-cumulative testimony concerning Google/Waymo’s forensic investigation into misappropriation of trade secrets, particularly analysis of log data and hardware; Google/Waymo’s reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server. Waymo further identifies

¹ Waymo's list includes witnesses who may be offered in rebuttal.

1			the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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3	Dan Chu	May be reached through counsel for Waymo	Mr. Chu will provide non-cumulative testimony regarding matters that concern Waymo, including investment in, development of, and management of Waymo's self-driving cars and autonomous vehicle technology; the current and future nature of the relevant markets and competition in the relevant markets, and other issues related to irreparable harm and damages suffered by Waymo, Waymo's short-term and long-term business plans, Waymo's early rider program in Phoenix, Waymo's launch of its TaaS service, and Waymo's understanding of the TaaS market (including competition in that market and Waymo's competitive advantages). Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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14	Dmitri Dolgov	May be reached through counsel for Waymo	Dr. Dolgov will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets, Waymo's engineering practices, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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21	Pierre-Yves Droz	May be reached through counsel for Waymo	Mr. Droz will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, time to develop Waymo's LIDAR designs and trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, the contents of Waymo's SVN server, and communications with Anthony Levandowski regarding Uber and
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1			formation of Otto. Waymo further identifies the subjects of Mr. Droz's prior declarations submitted in this matter, Dkt. 25-31, 453-3 as subject he may testify about as well as the Rule 30(b)(6) topics for which he was designated as Waymo's corporate witness.
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6	Eric Friedberg	May be reached through counsel for Stroz Friedberg:	Mr. Friedberg will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report, and the Uber-
7		Melanie Blunschi	Otto acquisition; Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure.
8		Latham & Watkins	
9		505 Montgomery Street, Suite 2000	
10		San Francisco, CA 94111-6538	
11		Direct Dial: +1.415.395.8129	
12		Email:	
13		melanie.blunschi@lw.com	
14	John Gardner	May be reached through counsel:	Mr. Gardner will be asked to provide non-cumulative testimony regarding Ottomotto and Otto Trucking; the Uber-
15		Merri Baldin	Otto acquisition; Mr. Levandowski's businesses; the Stroz due diligence analysis, investigation, and report; the misappropriation of Waymo trade secrets; and destruction of relevant evidence.
16		Rogers Joseph O'Donnell	
17		311 California Street, 10th fl	
18		San Francisco, CA 94104	
19		415.956.2828 main mbaldwin@rjo.com	
20	William Grossman	May be reached through counsel for Waymo	Mr. Grossman will provide non-cumulative testimony regarding Waymo's accidental receipt of an email containing an Otto LiDAR PCB.
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23	Dan Gruver	May be reached through counsel for Uber	Mr. Gruver will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; and the development of Waymo's self-driving car technology, including its LIDAR designs.
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28	Arturo Gonzalez	MoFo; May be reached	Mr. Gonzalez will be asked to provide non-cumulative testimony regarding

1		through counsel for Uber	MoFo's possession of misappropriated materials; destruction of relevant evidence; and Defendants' knowledge of same..
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3	Kristin Gunjonsson	May be reached through counsel for Waymo	Mr. Gudjonsson will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into misappropriation of trade secrets, particularly analysis of hardware; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server
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10	Bill Gurley	May be reached through counsel:	Mr. Gurley will be asked to provide non-cumulative testimony regarding Uber's acquisition of Otto; board meetings, discussions, and knowledge concerning the Otto acquisition including Mr. Kalanick and others' representations; facts surrounding Mr. Kalanick and board discussions concerning his termination; negotiations with Mr. Kalanick concerning the Otto acquisition and his resignation; Stroz due diligence report; and representations made by Mr. Kalanick regarding the Stroz report and Otto acquisition; and Benchmark's claim that Mr. Kalanick committed fraud and breached his fiduciary duty with respect to the Otto acquisition.
11		Martin Flumenbaum	
12		1285 Avenue of the Americas	
13		New York, NY 10019	
14		(212) 373-3191	
15		mflumenbaum@paulweiss.com	
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20	James Haslim	May be reached through counsel for Uber	Mr. Haslim will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets (including but not limited to through Tyto LIDAR), including their acquisition, use and disclosure, and the lack of independent development.
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24	Lambertus Hesselink	May be reached through counsel for Waymo	Professor Hesselink will provide expert testimony pertaining to optics as it relates to a LiDAR system for a self-driving vehicle; general optics and LiDAR principles, background state of the art; explain Waymo's disclosed trade secrets relating to LiDAR optical systems and components and is expected to provide opinions regarding the level of skill and effort required to derive such trade secrets
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1			based on the available evidence in this case. Retained Prof. Hesselink is expected to also opine that Waymo's LiDAR systems embody certain of Waymo's disclosed trade secrets.
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4			Prof. Hesselink is expected to further offer opinions that (i) Waymo undertook reasonable efforts to maintain certain disclosed trade secrets in relative secrecy;
5			(ii) such trade secrets are not generally known by individuals within the relevant filed and/or are not readily ascertainable;
6			and (iii) such trade secrets derive independent economic value by virtue of their not being generally known in the relevant field. Additionally, Prof.
7			Hesselink is expected to opine regarding Defendants' misappropriation of certain of Waymo's disclosed trade secrets based
8			on (i) contemporaneous technical evidence reflecting Defendants' acquisition, use, and/or disclosure of
9			Waymo's disclosed trade secret concepts; (ii) the similarity of Defendants' technology to Waymo's disclosed trade
10			secrets and/or Waymo's implementation of such trade secrets in Waymo's commercial products; and/or (iii) the lack
11			of evidence supporting Defendants' independent development of their own technology.
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18	Jeff Holden	May be reached through counsel for Uber	Mr. Holden will be asked to provide non-cumulative testimony regarding the state of Uber's autonomous vehicle program before the Otto acquisition; negotiations with Mr. Levandowski regarding the acquisition; Mr. Levandowski's consulting work; facts surrounding Mr. Levandowski's continued employment with Uber and termination; and Defendants' misappropriation of Waymo's trade secrets.
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24	Ben Ingram	May be reached through counsel for Waymo	Mr. Ingram will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets.
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28	Michael Janosko	May be reached through	Mr. Janosko will provide non-cumulative testimony regarding reasonable measures

1		counsel for Waymo	to protect security at Google and Waymo, including Google's enterprise infrastructure.
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3	Travis Kalanick	May be reached through counsel:	Mr. Kalanick will be asked to provide non-cumulative testimony regarding Uber's driverless car program; Uber's solicitation of Google and Waymo employees; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination; negotiations with Mr. Levandowski regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; solicitation of Google/Waymo employees; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence.
4		Melinda Haag	
5		Orrick	
6		405 Howard Street	
7		San Francisco, CA 94105-2669	
8		+1 415 773 5495	
9		mhaag@orrick.com	
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16	Rudy Kim	MoFo	Mr. Kim will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
17		May be reached through counsel for Uber	
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19	Anthony	May be reached through counsel:	Mr. Levandowski will be asked to provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, his performance at Waymo, the contents of Waymo's SVN server, and communications with Google employees regarding Uber and formation of Otto; Uber's driverless car program; Uber's solicitation of Google and Waymo employees; the relationship between the facts surrounding this case and his termination; negotiations regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto
20	Levandowski	Miles Erlich	
21		Ramsey & Ehrlich LLP	
22		803 Hearst Avenue	
23		Berkeley, CA 94710	
24		Tel: (510) 548-3600	
25		miles@ramsey-ehrllich.com	
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1			acquisition; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence. Waymo further identifies those subjects identified in Waymo's Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial. Dkt. 835.
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8	John Krafcik	May be reached through counsel for Waymo	Mr. Krafcik will provide non-cumulative testimony regarding Waymo's business; Anthony Levandowski, and his departure from Google; the relationship between Waymo and Google; and Waymo's development of its TaaS service, and valuations of Chauffeur.
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12	Brian McClendon	May be reached through counsel for Uber	Mr. McClendon will be asked to provide non-cumulative testimony regarding solicitation of and negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; and the Uber-Otto acquisition, the development of Uber's self-driving technology, including before the Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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19	Emil Michael	May be reached through counsel:	Mr. Michael will be asked to provide non-cumulative testimony regarding the negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; the Uber-Otto acquisition; Levandowski's employment and continued employment at Uber; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination.
20		Margaret Tough	
21		Latham & Watkins	
22		505 Montgomery Street	
23		Suite 2000	
24		San Francisco, CA 94111	
25		(415) 391-0600	
26		margaret.tough@lw.com	
27	Rhian Morgan	May be reached through counsel for Uber	Ms. Morgan will be asked to provide non-cumulative testimony regarding the founding and business of Ottomotto and
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1			Otto Trucking; Uber's acquisition of Otto; and the Stroz due diligence analysis, investigation, report; Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
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4	Angela Padilla	May be reached through counsel for Uber	Ms. Padilla will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; Levandowski's employment and continued employment at Uber; the relationship between the facts surrounding this case and his termination; and the Uber-Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development, destruction of relevant evidence.
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11	Gaetan Pennecot	May be reached through counsel for Uber	Mr. Pennecot will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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16	Cameron Poetzcher	May be reached through counsel for Uber	Mr. Poetzcher will be asked to provide non-cumulative testimony regarding Uber's negotiations with Mr. Levandowski regarding the formation of Ottomotto/Otto Trucking; and the acquisition; solicitation of Google/Waymo employees; destruction of relevant evidence.
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20	Nina Qi	May be reached through counsel for Uber	Ms. Qi will be asked to provide non-cumulative testimony regarding Uber's decision to acquire Ottomotto (and to enter into an option to acquire Otto Trucking); contacts between Uber and Mr. Levandowski regarding the formation of Ottomotto / Otto Trucking, Uber's acquisition of those entities, and the benefits that Uber would obtain via those acquisitions; Uber's solicitation of Google/Waymo employees; and Uber's internal views on those subjects, destruction of relevant evidence.
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27	Lior Ron	May be reached through counsel:	Mr. Ron will be asked to provide non-cumulative testimony regarding the misappropriation of Waymo trade secrets;
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1		Taylor & Patchen, LLP One Ferry Building, Suite 355 San Francisco, CA 94111 T: (415) 788-8200	founding of Ottomotto and Otto Trucking; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and the business and product development of Ottomotto and Otto Trucking, destruction of relevant evidence.
2	Bryan Salesky	May be contacted through counsel: Stacy North Pierce & Shearer LLP snorth@pierceshearer.com 650-843-1900	Mr. Salesky will provide non-cumulative testimony regarding the history of Google/Waymo's self-driving-car development efforts; Mr. Levandowski's performance as a Google/Waymo employee; certain of Mr. Levandowski's communications with Uber prior to his departure from Google/Waymo
3	Brent Schwarz	May be reached through counsel for Uber	Mr. Schwarz will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto.
4	Ognen Stojanovski	May be reached through counsel for Uber	Mr. Stojanovski will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto; regarding communications with Mr. Levandowski regarding Tyto LIDAR and other businesses related to Mr. Levandowski.
5	Eric Tate	May be reached through counsel for MoFo	Mr. Tate will be asked to provide non- cumulative testimony regarding the Uber- Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
6	Jim Timmins	May be reached through counsel for Waymo	Mr. Timmins will provide expert testimony regarding customary practices with respect to M&A transactions (including regarding indemnification) and the consideration paid by Uber to acquire Ottomotto (including relative to other acquisitions).

1	Chris Urmson	May be reached through counsel: Benjamin L. Singer 601 Montgomery St. Suite 1950 San Francisco, CA 94111 <u>415-500-6080</u>	Mr. Urmson will provide non-cumulative testimony regarding the history and development of Waymo's self-driving car technology, including its LIDAR designs; Mr. Levandowski's performance at Google and circumstances surrounding his termination from Google; Chauffeur Bonus Plan; Waymo valuation(s).
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7	Michael Wagner	May be reached through counsel for Waymo	Mr. Wagner will provide non-cumulative testimony regarding the relevant markets, irreparable harm, and the unjust enrichment and reasonable royalty measures of damages resulting from Defendants' misappropriation of Waymo's trade secrets.
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11	Tim Willis	May be reached through counsel for Waymo	Mr. Willis will provide non-cumulative testimony regarding Waymo's supply chain operation, including reasonable steps taken to protect confidential and proprietary information shared with suppliers.
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14	Salle Yoo	May be reached through counsel for Uber	Ms. Yoo will be asked to provide non- cumulative testimony regarding the Uber- Otto acquisition; the Stroz due diligence analysis investigation, and report; continued employment and termination of Anthony Levandowski; and Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
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19	Sasha Zbrozek	May be reached through counsel for Waymo	Mr. Zbrozek will provide non-cumulative testimony concerning Google/Waymo's forensic investigation, particularly the SVN server and related log data, including Mr. Levandowski's download of the 14,000 files from the SVN server; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks
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25 **II. WITNESSES WAYMO MAY PRESENT AT TRIAL IF THE NEED ARISES**

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27	Name	Contact Information	Substance of Testimony
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1	Eric Armursky	O'Melveny	Mr. Armursky will be asked to
2		2765 Sand Hill Road	provide non-cumulative
3		Palo Alto, CA 94025	testimony regarding the Stroz
4		(650) 473-2644	due diligence analysis,
5		eamdursky@omm.com	investigation, and report.
6	Tara Allport	May be reached through	Ms. Allport will be asked to
7		counsel for Stroz Friedberg	provide non-cumulative
8			testimony regarding the Stroz
9	Cristina Antalík	May be reached through	due diligence analysis,
10		counsel for Stroz Friedberg	investigation, and report.
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12	Alisa Baker	Levine & Baker	Ms. Baker will be asked to
13		466 Green Street	provide non-cumulative
14		Suite 303	testimony regarding the Stroz
15		San Francisco, CA 94133	due diligence analysis,
16		(415) 391-2995	investigation, and report.
17	Chelsea Bailey	May be reached through	Ms. Bailey will provide non-
18		counsel for Waymo	cumulative testimony
19			regarding the Chauffeur Bonus
20			Plan; Mr. Levandowski's
21			departure from Google,
22			including Google's collection
23			of Levandowski's laptops and
24	Elisabeth Balassone	MoFo; May be reached	delivery of those laptops to the
25		through counsel for Uber	Google forensics team; and
26			Mr. Levandowski's
27	Travis Bellanger	May be reached through	performance as a
28		counsel for Waymo	Google/Waymo employee
			Ms. Balassone will be asked to
			provide non-cumulative
			testimony regarding the Stroz
			due diligence analysis,
			investigation, and report.
			Mr. Bellanger will provide
			non-cumulative testimony
			concerning Google/Waymo's
			forensic investigation into the

1			activities of Anthony Levandowski, including
2			Google's collection of
3			Levandowski's laptops and
4			delivery of those laptops to the
5	Adam Bentley	May be reached through	Google forensics team
6		counsel for Uber	Mr. Bentley will be asked to
7			provide non-cumulative
8			testimony regarding the Uber-
9	Shouvik Biswas	MoFo; May be reached	Otto acquisition; the Stroz due
10		through counsel for Uber	diligence analysis,
11			investigation, and report; and
12	Matthew Blattmachr	May be	destruction of relevant
13		reached through counsel:	evidence.
14		Diane F. Vallentine	Mr. Biwas will be asked to
15		Jermain, Dunnagan & Owens,	provide non-cumulative
16		PC	testimony regarding the
17		3000 A Street, Suite 300	ownership of Levandowski's
18		Anchorage, AK 99503	companies
19	Scott Boehmke	May be reached through	Mr. Battmachr will be asked to
20		counsel for Uber	provide non-cumulative
21			testimony regarding the
22			misappropriation of Waymo's
23			trade secrets, including their
24	Judith Branham	May be reached through	acquisition, use and disclosure,
25		counsel for Stroz Friedberg	and the lack of independent
26			development.
27	Don Burnette	May be reached through	Mr. Branham will be asked to
28		counsel for Uber	provide non-cumulative
			testimony concerning

1			Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and software; due diligence by Stroz for Otto acquisition by Uber; and destruction of relevant evidence.
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8	Hanley Chew	May be reached through counsel for Stroz Friedberg	Mr. Chew will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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11	Mitchell Dobi	May be reached through counsel for Stroz Friedberg	Mr. Dobi will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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14	Gerard Dwyer	May be reached through counsel for Waymo	Mr. Dwyer will provide non-cumulative testimony regarding inputs to Waymo's current P&L. He may also provide testimony regarding Waymo's current business plan.
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18	Anna Ferrari	MoFo; May be reached through counsel for	Mr. Ferrari will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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21	Paul French	May be reached through counsel for Waymo	Rebuttal of expert testimony of Kevin Faulkner, including opinions related to the various flaws and errors in Stroz's search for Waymo confidential information at Uber; rebuttal of expert testimony of Erik Laykin, including opinions related to the Waymo forensic investigation, Anthony Levandowski's download of the 14,000 files, Radu Raduta's download of confidential documents from Google Drive and Sameer Kshirsagar's download of
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1			confidential documents from Google Drive
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3	Mary Fulginiti	May be reached through counsel for Stroz Friedberg	Ms. Fulginiti will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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6	Christine Gabitass	May be reached through counsel for Stroz Friedberg	Ms. Gabitass will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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9	Gataum Gupta	May be reached through counsel for Uber	Mr. Gupta will be asked to provide non-cumulative testimony regarding Uber's acquisition of Ottomotto and Uber's funding of Otto Trucking's business activities.
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12	Bruce Hartley	May be reached through counsel for Waymo	Rebuttal of expert testimony of Erik Laykin, including opinions related to security measures taken by Google/Waymo to protect their confidential and proprietary information, including but not limited to materials stored in Waymo's SVN repository
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17	Don Harrison	May be reached through counsel for Waymo	Mr. Harrison will provide non-cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, and Waymo's valuations.
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23	Jennifer Haroon	May be reached through counsel for Waymo	Ms. Haroon will provide non-cumulative testimony regarding details of Waymo's first P&L, the negotiation of the valuation used in connection with the Chauffeur Business Plan, the timing of payments made under the Chauffeur Business Plan, and the 409(a) valuation conducted when Waymo was spun off
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1			from Google. Ms. Haroon may also provide testimony regarding the evolution of Waymo's business plan over time. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which she was designated as Waymo's corporate witness.
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7	Soren Juelsgaard	May be reached through counsel for Uber	Mr. Juelsgaard will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and software; due diligence by Stroz for Otto acquisition by Uber; and destruction of relevant evidence.
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15	Asheem Linaval	May be reached through counsel for Uber	Mr. Linaval will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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21	David Lawee	May be reached through counsel for Waymo	Mr. Lawee will provide non-cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, Waymo's valuations, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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1	Christian Lymn	May be reached through counsel for Uber	Mr. Lymn will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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4	Teresa MacLean	MoFo; May be reached through counsel for	Ms. MacLean will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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7	Jessica Madore	May be reached through counsel for Stroz Friedberg	Ms. Madore will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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10	Melanie Maugeri	May be reached through counsel for Stroz Friedberg	Ms. Maugeri will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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13	Kenneth Mendelson	May be reached through counsel for Stroz Friedberg	Mr. Mendelson will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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16	Colette Reiner Mayer	MoFo; May be reached through counsel for Uber	Ms. Mayer will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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18			
19	Tom Nolan	Nolan Barton Olmos, LLP	Mr. Nolan will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
20		600 University Avenue	
21		Palo Alto, CA 94301	
22		Phone: (650) 326-2980	
23	Daniel Olmos	Nolan Barton Olmos, LLP	Mr. Olmos will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
24		600 University Avenue	
25		Palo Alto, CA 94301	
26		Phone: (650) 326-2980	
27	Christine Oropeza	May be reached through counsel for Stroz Friedberg	Ms. Oropeza will be asked to provide non-cumulative testimony regarding the Stroz
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1			due diligence analysis, investigation, and report.
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3	Colin Sebern	May be reached through counsel for Uber	Mr. Sebern will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and software; due diligence by Stroz for Otto acquisition by Uber.
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10	Timothy Schirm	May be reached through counsel for Stroz Friedberg	Mr. Schirm will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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13	Joe Shapiro	May be reached through counsel for Stroz Friedberg	Mr. Shapiro will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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16	Sharat Sridhar	May be reached through counsel for Stroz Friedberg	Mr. Sridhar will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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19	Justin Suhr	May be reached through counsel for Uber	Mr. Suhr will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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22	Aditi Tatti	May be reached through counsel for Stroz Friedberg	Mr. Tatti will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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25	Diek Van Nort	MoFo; May be reached through counsel for Uber	Mr. Van Nort will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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1	Michael Xing	May be reached through counsel for Waymo	Mr. Xing will provide non-cumulative testimony concerning the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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6	Serenity Wang	Nolan Barton Olmos, LLP	Ms. Wang will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
7		600 University Avenue	
8		Palo Alto, CA 94301	
9		Phone: (650) 326-2980	
10	Benjamin Williams	MoFo; May be reached through counsel for	Mr. Williams will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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12			
13	Charles Wille	May be reached through counsel for Stroz Friedberg	Mr. Wille will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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16	Wendy Wu	May be reached through counsel for Stroz Friedberg	Ms. Wu will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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III. WITNESSES WHO MAY TESTIFY BY DEPOSITION

The following witnesses may testify by deposition:

Anthony Levandowski

Travis Kalanick

Nina Qi

Bill Gurley

Jeff Holden

John Bares

Gaetan Pennecot

1 Dan Gruver
2 James Haslim
3 Cameron Poetzcher
4 Scott Boehmke
5 Lior Ron
6 Adam Bentley
7 Rhian Morgan
8 Don Burnette
9 Soren Julesgaard
10 Ognen Stojanovski
11 Salle Yoo
12 Gataum Gupta
13 Emil Michael
14 Asheem Lineval
15 Colin Sebern
16 Brent Schwarz
17 Angela Padilla
18 Justin Suhr
19 Christian Lymn
20 Eric Tate
21 Rudy Kim
22 Arturo Gonzalez
23 Anna Ferrari
24 Colette Reiner Mayer
25 Teresa MacLean
26 Shouvik Biswas
27 Diek Van Nort
28 Elizabeth Balassone

1 Benjamin Williams
2 John Gardner
3 Eric Amdursky
4 Alisa Baker
5 Tom Nolan
6 Daniel Olmos
7 Serenity Wang
8 Chris Urmson
9 Brian McClendon
10 Bryan Salesky
11 [REDACTED] / Matthew Blattmachr
12 Eric Friedberg
13 Tara Allport
14 Cristina Antalik
15 Judith Branham
16 Hanley Chew
17 Mitchell Dobi
18 Mary Fulginiti
19 Christine Gabbitass
20 Jessica Madore
21 Melanie Maugeri
22 Kenneth Mendelson
23 Christine Oropeza
24 Timothy Schirm
25 Joe Shapiro
26 Sharat Sridhar
27 Aditi Tatti
28 Charles Wille

1 Wendy Wu

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3 DATED: September 16, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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5 By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC